

VIA FACSIMILE (914) 390-4095

The Honorable George A. Yanthis United States Magistrate Judge United States District Court, Southern District of New York 300 Quarropas St., Room 118 White Plains, NY 10601

Re: John Bellantoni, et al. v. General Motors Corporation, et al.

Docket No. 08-CV 2407 (CLB) Trial Date: November 1, 2009

Dear Judge Yanthis:

We write seeking the entry of General Motors Corporation's ("GM") proposed Protective Order for Documents governing the production of GM's proprietary information and trade ecrets in this case. We certify that we have attempted to meet and confer with Plaintiffs' counsel to resolve these issues without Court action.

Factual and Procedural Background

By Order dated July 24, 2008, this Court directed the parties to make a good faith effort to reach an agreement regarding the terms of a protective order governing the production of documents containing GM's trade secrets and proprietary information. On July 29, 2008 and August 5, 2008, the parties held telephone conferences to negotiate the terms of a protective order. Counsel for GM agreed to each of Plaintiffs' proposed changes to GM's Protective Order for Documents, with the exception of those provisions that would allow Plaintiffs to disclose protected documents to governmental agencies, watchdog groups, the press, the media, or any other person not subject to the provisions of a protective order. Specifically, Paragraphs 6 and 7 of Plaintiffs' Proposed Protective Order seeks to permit Plaintiffs to disclose any protected document, based on what counsel for Plaintiffs has deemed "the public interest and the protection of consumers." Further, Plaintiffs seek to limit the protection of GM's trade secrets

E-mail: brian.telfair@leclairryan.com Direct Phone: 804.783.7539 Diroct Fax: 804,783,7639

951 East Byrd Street, Elghth Floor Richmond, Virginia 23219 Phone: 804.783.2003 \ Fax: 804.783.2294

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ATTORNEYS AT LAW \ WWW, LECLAIRRYAN.COM

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